

EXHIBIT 21

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11 *Attorneys for Plaintiffs Electrograph Systems, Inc.,*
12 *Electrograph Technologies, Corp., Office Depot, Inc.,*
13 *Compucom Systems, Inc., Interbond Corporation of*
14 *America, P.C. Richard & Son Long Island*
Corporation, MARTA Cooperative of America, Inc.,
ABC Appliance, Inc., Schultze Agency Services LLC
on behalf of Tweeter Opco, LLC and Tweeter
Newco, LLC

15 [additional counsel listed on signature page]

16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**

19 **In re: CATHODE RAY TUBE (CRT)**
ANTITRUST LITIGATION

20 This Document Relates to:

21 *Electrograph Systems, Inc. et al. v. Technicolor SA,*
22 *et al., No. 13-cv-05724;*

23 *Siegel v. Technicolor SA, et al., No. 13-cv-05261;*

24 *Best Buy Co., Inc., et al. v. Technicolor SA, et al.,*
25 *No. 13-cv-05264;*

26 *Target Corp. v. Technicolor SA, et al., No. 13-cv-*
27 *05686;*

28 *Interbond Corporation of America v. Technicolor*
SA, et al., No. 13-cv-05727;

Case No. 07-cv-05944 SC

MDL No. 1917

DIRECT ACTION PLAINTIFFS'
FIRST SET OF
INTERROGATORIES TO
DEFENDANT MITSUBISHI
ELECTRIC CORPORATION

DATE: MAY 7, 2014

Office Depot, Inc. v. Technicolor SA, et al., No. 13-cv-05726;

Costco Wholesale Corporation v. Technicolor SA, et al., No. 13-cv-05723;

P.C. Richard & Son Long Island Corporation, et al. v. Technicolor SA, et al., No. 31:cv-05725;

Schultze Agency Services, LLC v. Technicolor SA, Ltd., et al., No. 13-cv-05668;

Sears, Roebuck and Co. and Kmart Corp. v. Technicolor SA, et al. No. 3:13-cv-05262

Dell Inc., et al. v. Hitachi Ltd., et al., No. 13-cv-02171;

Tech Data Corp., et al. v. Hitachi, Ltd., et al., No. 13-cv-00157.

PROPOUNDING PARTIES:

Direct Action Plaintiffs Electrograph Systems, Inc. and Electrograph Technologies Corp.; Alfred H. Siegel, solely as Trustee of the Circuit City Stores, Inc. Liquidating Trust; Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., Bestbuy.com, L.L.C., and Magnolia Hi-Fi, Inc.; Target Corp., Sears, Roebuck, and Co., Kmart Corp.; Interbond Corporation of America; Office Depot, Inc.; Costco Wholesale Corporation; P.C. Richard & Son Long Island Corporation, MARTA Cooperative of America, Inc., and ABC Appliance, Inc.; Schultz Agency Services, LLC on behalf of Tweeter Opco, LLC and Tweeter Newco, LLC; Dell Inc.; Dell Products L.P.; and Tech Data Corporation and Tech Data Product Management, Inc.

RESPONDING PARTY:

Mitsubishi Electric Corporation

SET NO.:

ONE

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, the above named Direct Action Plaintiffs, through their undersigned counsel, request that Mitsubishi Electric Corporation answer the following Interrogatories within thirty (30) days of service and supplement its Interrogatory answers, as necessary, to comply with Federal Rule of Civil Procedure 26(e). Mitsubishi Electric Corporation is directed to serve verified answers at BOIES, SCHILLER & FLEXNER, LLP, Attn: Philip J. Iovieno, 30 South Pearl Street, 11th Floor, Albany, NY 12204, or at another time and place as may be mutually agreed upon by counsel for the parties.

DEFINITIONS

1. The terms “Defendant” and “Defendants” mean any defendant named by a Direct Action Plaintiff in a complaint in these actions (including all Direct Action Plaintiff actions consolidated in the *In re Cathode Ray Tube (CRT) Antitrust Litigation* multidistrict litigation, MDL No. 1917) and their present or former Employees, officers, directors, agents, predecessors, successors, parents, subsidiaries, affiliates, or any other person acting on their behalf.

2. The terms “Co-conspirator” and “Co-conspirators” mean any non-Defendant entity named by a Direct Action Plaintiff in a complaint in these actions (including all Direct Action Plaintiff actions consolidated in the *In re Cathode Ray Tube (CRT) Antitrust Litigation* multidistrict litigation, MDL No. 1917) as a member of a conspiracy and their present or former Employees, officers, directors, agents, predecessors, successors, parents, subsidiaries, affiliates, or any other person acting on their behalf.

3. The term “Affiliated Entity(ies)” means any entity(ies) involved in the production, pricing, marketing, distribution, and/or sale of CRTs (as those terms are defined herein) at any time during the Relevant Period (as defined herein) in which You, or any division, subdivision, business unit, parent, subsidiary, affiliate, or joint venture thereof, held any ownership interest at any time during the Relevant Period.

4. The term “Mitsubishi Subsidiaries” means Mitsubishi Electric Visual Solutions America, Inc. (f/k/a Mitsubishi Digital Electronics America, Inc.) and Mitsubishi Electric &

1 Electronics USA, Inc., including each of their respective officers, directors, agents, predecessors,
2 successors, parents, subsidiaries, affiliates, or any other person acting on their behalf

3 5. The term "Person" means any individual or group of individuals, corporation,
4 partnership, association, governmental entity, department, commission, bureau or any other kind
5 of legal or business entity.

6 6. The terms "You," "Your," and "Yourself" mean Mitsubishi Electric Corporation,
7 and present or former Employees, officers, directors, agents, predecessors, successors, parents,
8 subsidiaries, affiliates, or any other person acting on Your behalf.

9 7. The term "Employee" means any individual currently in the employ of, or at any
10 time employed by, or acting as the agent of a Defendant as defined herein.

11 8. The term "Document" includes all documents and electronically stored
12 information as defined in Federal Rule of Civil Procedure 34(a). A draft or non-identical copy is
13 a separate document within the meaning of this term.

14 9. The term "CRT(s)" means cathode ray tube(s).

15 10. The term "CRT Manufacturer" means any entity that manufactures or
16 manufactured CRTs.

17 11. The term "CRT Product(s)" means product(s) containing cathode ray tube(s).

18 12. Unless otherwise noted, the term "Relevant Period" means the period from March
19 1, 1995 through December 31, 2007.

20 13. When referring to a Document, "Identify" means, to the extent known, the (i) type
21 of document; (ii) general subject matter; (iii) date of the document; and (iv) author(s), sendee(s),
22 addressee(s), recipient(s), and custodian(s).

23 14. When referring to any fact, act, occurrence, transaction, statement,
24 communication, document, or other matter, "Identify," "Describe," "Explain," or "State" means
25 to describe and identify the facts constituting such matter.

26 15. The term "Meeting" means, without limitation, any assembly, convocation,
27 encounter, or contemporaneous presence of two or more persons for any purpose, whether
28 planned or arranged, scheduled or not.

1 language deemed to be ambiguous and the interpretation utilized in the response to the
2 Interrogatory.

3 6. When asked to identify a natural person, state the person's name, employer,
4 position, dates of employment or tenure, and home address for all times during the Relevant
5 Period. If any of such information has changed during the Relevant Period, specify the time
6 period to which the information provided in Your answer pertains.

7 7. When asked to identify any entity other than a natural person, state the name and
8 address of the principal office or headquarters. If any of the information has changed during the
9 Relevant Period, specify the time period to which the information provided in Your answer
10 pertains.

11 8. If You elect to produce business records in response to an Interrogatory pursuant
12 to Federal Rule of Civil Procedure 33(d), You shall produce the records as they are kept in the
13 usual course of business or shall organize and label them to correspond with the Interrogatory. If
14 the document is being produced in its native electronic format (allowing the document to retain
15 its metadata), identify the document using its hash or other appropriate electronic identification
16 and identify the Interrogatories to which the document is responsive. If the document is not
17 being produced in electronic form, identify the document using the applicable bates numbers or
18 specifically identify the type of document being produced (e.g., letter, memorandum, telegram,
19 contract, invoice, etc.), its date and author(s), its custodian, and every person to whom such
20 document or any copy thereof was given or sent. For all documents produced pursuant to Rule
21 33(d), identify the name of the employee, officer, or agent certifying the documents as business
22 records.

23 **INTERROGATORIES**

24 **Interrogatory No. 1.**

25 Identify the CRT and/or CRT Products that You manufactured or produced for
26 each month within the Relevant Period, including the brand name, product number, and intended
27 use.
28

1 **Interrogatory No. 2.**

2 Identify the CRT and/or CRT Products that You sold, marketed, or distributed for
3 each month within the Relevant Period, including the brand name, product number, and intended
4 use.

5 **Interrogatory No. 3.**

6 Provide Your sales of CRTs and/or CRT Products to the United States and
7 globally for each month during the Relevant Period. For each month during this period, State the
8 volume of sales, the U.S. dollar value of sales, the unit sale price, the per unit cost to produce
9 CRTs and/or CRT Products, the per unit cost to distribute CRTs and/or CRT Products (including
10 overseas freight, tariff, customs, duties, inland freight, storage, insurance, dealer commissions),
11 and the per unit profit earned.

12 **Interrogatory No. 4.**

13 Identify every channel used by You to sell, market, or distribute CRTs and/or
14 CRT Products during the Relevant Period. If You used different channels at different points
15 within the Relevant Period, Identify when You used each channel to sell, market, or distribute
16 CRTs and/or CRT Products.

17 **Interrogatory No. 5.**

18 Identify each current and former Employee who has or had any managerial
19 responsibility for recommending, reviewing, setting or approving prices, bids, quotes, or rebates
20 for Your CRTs and/or CRT Products during the Relevant Period. For each Person identified,
21 include his or her name, address, title, location, the division or unit of the company where he or
22 she worked, and a description of his or her responsibilities throughout the Relevant Period.

23 **Interrogatory No. 6.**

24 Identify each Employee with pricing authority who attended any trade association
25 during the Relevant Period relating to CRTs and/or CRT Products and State with respect to each
26 Employee:

27 (a) the trade association attended;

28 (b) the dates of attendance;

(c) any offices, chairs or committee positions held in each of the trade associations; and the dates which those offices, chairs or committee positions were held.

Interrogatory No. 7.

Identify each actual or proposed agreement, including a draft agreement, between You and any producer of CRTs and/or CRT Products, including Defendants or Co-conspirators, relating to prices, pricing, production or inventory levels of CRTs and/or CRT Products during the Relevant Period. For every such actual or proposed agreement, State:

(a) the identity of the participants and all persons with knowledge thereof;

(b) when such agreement was entered into;

(c) where such agreement was entered into;

(d) the terms of such agreement; and

(e) when, how, and which of Your officers, directors or Employees discovered the existence of such agreement.

Interrogatory No. 8.

Identify all Communications and/or Meetings between You and any other producer or producers of CRTs and/or CRT Products during the Relevant Period (including but not limited to the named Defendants or Co-conspirators in this coordinated proceeding), regarding, discussing, mentioning or relating to the sales, production, and/or prices of CRTs in and/or for the United States, Mexico, and/or Brazil during the Relevant Period, specifically identifying any Communications and/or Meetings occurring solely in the context of a Customer-supplier relationship between You and a Customer. For all Communications and/or Meetings:

(a) State the date and location of the Meeting and/or Communication;

(b) Identify the Person(s) who initiated, called, organized, attended, or participated in the Meeting and/or Communication;

(c) Describe the subject matter(s) of the Meeting and/or Communication, including details of any information provided, received, or exchanged;

(d) Identify all Persons with knowledge relating to the Meeting and/or Communication;

(e) Describe the type and dimensions of the CRTs discussed;

1 (f) Identify whether the attendees at the Meeting and/or Persons involved in the
2 Communication reached any agreement concerning CRT sales, production, and/or
3 prices.

4 **Interrogatory No. 9.**

5 To the extent not previously identified in response to Interrogatory No. 8, Identify
6 all Communications and/or Meetings between You and any other producer or producers of CRTs
7 and/or CRT Products during the Relevant Period (including but not limited to Defendants or Co-
8 conspirators) regarding, discussing, mentioning or relating to the sales, production, and/or prices
9 of CPTs, where at least one party to the Communication was employed in and/or based out of the
10 U.S., Mexico, and/or Brazil at the time of the Communication, specifically identifying any
11 Communications and/or Meetings conducted solely in the context of a Customer-supplier
12 relationship between You and a Customer. For all Communications and/or Meetings:

- 13 (a) State the date and location of the Meeting and/or Communication;
14 (b) Identify the Person(s) who initiated, called, organized, attended, or participated in the
15 Meeting and/or Communication;
16 (c) Describe the subject matter(s) of the Meeting and/or Communication, including
17 details of any information provided, received, and/or exchanged;
18 (d) Identify all Persons with knowledge relating to the Meeting and/or Communication;
19 (e) Describe the type and dimensions of the CPTs discussed;
20 (f) Identify whether the attendees at the Meeting and/or Persons involved in the
21 Communication reached any agreement concerning CPT sales, production and/or
22 prices.

23 This request includes instances where Communications with outside parties are
24 forwarded to, or subsequently shared with, Persons based in the United States, Mexico, and/or
25 Brazil, or employed by an Affiliated Entity of a Defendant in the United States, Mexico, and/or
26 Brazil.

1 **Interrogatory No. 10.**

2 To the extent not previously identified in response to Interrogatory Nos. 8 or 9,
3 Identify any Communication or Meeting between You and any other producer or producers of
4 CRTs and/or CRT Products during the Relevant Period (including but not limited to Defendants
5 or Co-conspirators) regarding, discussing, mentioning or relating to the sales, production, and/or
6 prices of CPTs during the Relevant Period, specifically identifying any Communications and/or
7 Meetings conducted solely in the context of a Customer-supplier relationship between You and a
8 Customer. For all Communications and/or Meetings:

- 9 (a) State the date and location of the Meeting and/or Communication;
10 (b) Identify the Person(s) who initiated, called, organized, attended, or participated in the
11 Meeting and/or Communication;
12 (c) Describe the subject matter(s) of the Meeting and/or Communication, including
13 details of any information provided, received, and/or exchanged;
14 (d) Describe all Persons with knowledge relating to the Meeting and/or Communication;
15 (e) Describe the type and dimensions of the CPTs discussed;
16 (f) Identify whether the attendees at the Meeting and/or persons involved in the
17 Communication reached any agreement concerning CPT sales, production and/or
18 prices.

19 **Interrogatory No. 11.**

20 Identify each instance during the Relevant Period in which You or any other
21 producer of CRT and/or CRT Products, including Defendants in this coordinated proceeding,
22 instituted a price increase or decrease for CRTs, and for each such instance:

- 23 (a) when the price increase or decrease was announced publicly;
24 (b) when the price increase or decrease was implemented;
25 (c) the amount of the price increase or decrease;
26 (d) whether such price increase or decrease was withdrawn;
27 (e) each Person with responsibility for implementing the price increase or decrease or its
28 withdrawal; and

1 (f) any explanation given for the price increase or withdrawal.

2 **Interrogatory No. 12.**

3 Explain Your corporate structure during the Relevant Period, including:

- 4 (a) identification of departments and divisions;
- 5 (b) identification of all individuals with managerial responsibility for purchase or sale of
- 6 CRTs;
- 7 (c) identification of Your subsidiaries, affiliates, associates, partnerships, joint ventures,
- 8 stock co-ownerships, or other business relationships engaged in the production,
- 9 purchase, or sale of CRTs and/or CRT products;
- 10 (d) identification of Your owners and their percentages of ownership. For each owner,
- 11 please also state whether that owner also had a financial stake in other entities
- 12 engaged in the production, purchase, or sale of CRTs or CRT products.

13 **Interrogatory No. 13.**

14 Identify and describe all joint ventures, partnerships, or other cooperative business

15 relationships, during the Relevant Period, relating to CRT and/or CRT Products between You

16 and any other CRT or CRT Products producer.

17 **Interrogatory No. 14.**

18 State whether any Documents or information responsive to this set of

19 interrogatories were destroyed, discarded, erased, deleted, purged, or otherwise lost. If Your

20 answer is in any way in the affirmative:

- 21 (a) Describe in detail the contents of each such Document or information and the date it
- 22 was destroyed, discarded, erased, deleted, purged or lost;
- 23 (b) Identify each Person who had any role or responsibility in destroying, discarding,
- 24 erasing, purging, deleting or losing of each such Document or information; and
- 25 (c) Describe in detail the circumstances under which each such Document or information
- 26 was destroyed, discarded, erased, deleted, purged, or lost.

27 **Interrogatory No. 15.**

28

1 Identify the corporate relationship between You and the respective Mitsubishi
 2 Subsidiaries during the Relevant Period and up to and including today, including but not limited
 3 to:

- 4 (a) Your percentage ownership;
- 5 (b) any business departments or functions (e.g., public relations, advertising, press,
 6 marketing, sales) shared between the respective Mitsubishi Subsidiaries and You, or
 7 that share common systems and procedures;
- 8 (c) policies, practices and/or requirements relating to Your participating in negotiations,
 9 entering into, or signing contracts for, or on behalf of the respective Mitsubishi
 10 Subsidiaries;
- 11 (d) policies, practices, and/or requirements regarding Your oversight, direction,
 12 supervision, endorsement, approval or disapproval of the respective Mitsubishi
 13 Subsidiaries' production, sales, pricing, marketing, or distribution of CRTs or CRT
 14 Products;
- 15 (e) the identity of all individuals who served as officers, directors, Employees, agents or
 16 representatives of both You and the respective Mitsubishi Subsidiaries at any time
 17 during the Relevant Period, whether simultaneously or not;
- 18 (f) the respective Mitsubishi Subsidiaries' accounting treatment for Your sales, including
 19 whether the respective Mitsubishi Subsidiaries ever booked proceeds from You; and
- 20 (g) Your accounting treatment for the respective Mitsubishi Subsidiaries' sales, including
 21 whether You ever booked proceeds from the respective Mitsubishi Subsidiaries.

22 **Interrogatory No. 16.**

23 Describe the Communications between Your personnel and the respective
 24 Mitsubishi Subsidiaries' personnel relating to CRT prices, CRT customers, or CRT production,
 25 including the frequency and manner of any such Communications, and any individuals involved.
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1 **Interrogatory No. 17.**

2 For each civil action in any of the federal or state courts of the United States in
3 which you have participated as a plaintiff or a defendant, please state the following:

4 (a) the title and docket number of the action;

5 (b) the name and location of the court or courts in which the action(s) is or are or was
6 or were pending, including any transferor or transferee courts;

7 (c) the date on which the action was instituted;

8 (d) the disposition, if any, of the action;

9 (e) the identity of each party; and

10 (f) the identity of each attorney who appeared (including, in the case of a law firm,
11 the individual(s) responsible for the case) and which party(ies) each represented.

12 **Interrogatory No. 18.**

13 Identify the following information about any agreements, joint ventures or
14 cooperative activities, including but not limited to any technology sharing, cross-licensing,
15 crosspurchasing, or research and development agreements or arrangements, You entered into or
16 engaged in with any other Supplier concerning CRT and/or CRT Products during the Relevant
17 Period:

18 (a) the purpose of such agreement, joint venture or cooperative activity;

19 (b) Your current or former employees involved in such agreement, joint venture or
20 cooperative activity;

21 (c) the current or former employees of the other Supplier(s) involved in such agreement,
22 joint venture or cooperative activity;

23 (d) the date(s) of any such agreement, joint venture or cooperative activity; and

24 (e) all Documents referring to or relating to such agreement, joint venture or cooperative
25 activity.

1 **Interrogatory No. 19.**

2 Do You contend that during the Relevant Period You made decisions regarding
3 whether to invest in new or additional CRT capacity on the basis of the analysis of the cost of
4 such investment?

5 **Interrogatory No. 20.**

6 If the answer to the previous Interrogatory is yes, please Identify all Documents
7 relating to any such analyses of the cost of investment in new or additional CRT capacity
8 performed in connection with Your investment decisions during the Relevant Period.

9 **Interrogatory No. 21.**

10 Do You contend that during the Relevant Period You made decisions regarding
11 whether to invest in new or additional CRT capacity on the basis of the analysis of the expected
12 and/or potential profitability of such investments?

13 **Interrogatory No. 22.**

14 If the answer to the previous Interrogatory is yes, please Identify all Documents
15 relating to any such analyses of the expected and/or potential profitability of investments in new
16 or additional CRT capacity performed in connection with Your investment decisions during the
17 Relevant Period.

18 **Interrogatory No. 23.**

19 For each of the following persons not otherwise identified in any of the preceding
20 interrogatories, identify his or her employer, position, dates of employment/tenure, division or
21 unit of Mitsubishi Electric Corporation, Mitsubishi Electric Visual Solutions America, Inc. or
22 Mitsubishi Electric & Electronics USA, Inc. in which he or she worked, a description of his or
23 her responsibilities, and business and home address for all times during the relevant period, as
24 well as his or her current employer and business and home address:

- 25 1. Chien-Jen Wang
26 2. Wen-Hsian Tseng
27 3. Yangyo Jiyuan
28 4. Yu-Ji Lin

1 5. CRT Business Division G.M. Mr. Ishii

2 6. H. Nakajima

3 7. Tsukamoto

4 8. Hideo Imami

5 9. Jian-Ren Wang

6 10. M. Konishi

7 11. Yoshida

8 12. Katsuno Tsujiyama

9 13. S. Yokota

10 14. Fuisima

11 15. Yamakage

12 16. Murata

13 17. Norikazu Nakanishi

14 18. Nakashima

15 19. Mr. Kate

16 **Interrogatory No. 24.**

17 If you contend that the prices of any CRT or CRT Product did not result from an
18 agreement with a competitor or competitors, identify any witness(es) you may call at trial or rely
19 upon in a motion for summary judgment, partial summary judgment, or judgment on the
20 pleadings to support that contention.

21 **Interrogatory No. 25.**

22 State the name, address, and relationship to You of each Person who prepared or
23 assisted in the preparation of the responses to these interrogatories. (Do not identify anyone who
24 simply typed or reproduced the responses.)
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26
27
28

1 DATED: May 7, 2014

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/s/

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10 /s/

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23 *Magnolia Hi-Fi, Inc.*

24 /s/

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*Attorneys for Plaintiff Alfred H. Siegel, as Trustee of
the Circuit City Stores, Inc. Liquidating Trust*

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